

NSR (BAE) REFORM WORKGROUP**MEETING NOTES**

No. 001

Date: May 3, 2004**Place:** IDNR - Urbandale, IA**Project/Purpose:** NSR Workgroup
BAE Subgroup Kick-off Meeting**Attendees:** Kelly Jorgensen, AGP
Wayne Jochmann, ALCOA
Steve Van Ootegham, Terracon
Pete Hamlin, MidAmerican Energy
Julie Peshkin, Monsanto
Leo Nichols, Northern Natural Gas
Richard Ney, Sebesta Blomberg & Associates
James Hodina, Stanley Consultants
Lisa Schmidt, Thompson Environmental
Mike Valde, University of Iowa
Gene Taylor, Roquette America, Inc.
Fred Van Schepen, John Deere
Gary Smith, IDNR
Dave Phelps, IDNR**Notes By:** James Hodina

The following meeting notes set forth our understanding of the discussions and decisions made at this meeting. If you have any questions, additions, or comments, please contact the writer immediately. If we do not hear from you, we will assume that our understandings are the same. We are proceeding based on the contents of these meeting notes.

ITEM	SUBJECT	DISCUSSION	ACTION
1	Workgroup Organization	Wayne Jochmann opened the meeting with discussion of who would chair the BAE Workgroup. Jim Hodina agreed to take minutes of the meeting.	Wayne was unanimously confirmed as chair.
2	Subgroup Membership	A roll call of membership was taken. Gene Taylor (Roquette) and Fred Van Schepen (John Deere) were additions to the BAE work group. Chuck Hallier (Cargill) and Bill Chrisman (GPC) were not present. Alan Arnold (Alliant) had moved from the BAE workgroup and into another NSR workgroup.	Update the BAE Workgroup Membership List
3	Rule Development	The workgroup discussed whether to immediately recommend adopting the NSR rules as promulgated by EPA and not to suggest other additions or clarifications to the Iowa Code. At question was whether additional rules could be implemented without conflicting EPA guidelines. The workgroup decided that additional analysis of the NSR Reform Regulations was needed before such a final determination should be made.	Agreed to move forward with BAE analysis.

ITEM	SUBJECT	DISCUSSION	ACTION
4	Identification of BAE Potential Issues	<p>An approach for reviewing the NSR Reform Rules and identifying potential BAE issues was discussed. The workgroup agreed to break up the rule in accordance with the outline contained in EPA's preamble, beginning at 67 FR 80195. Beginning with Item C and concluding with Item F, the following assignments were made:</p> <p>C1. Kelly Jorgensen C2. No action required C3. Jim Hodina C4. Jim Hodina C5. Fred Van Schepen C6. Lisa Schmidt C7. Julie Peshkin C8. No action required D1. Gene Taylor D2. No action required D3. Leo Nichols D4. Leo Nichols D5. Wayne Jochmann E. Pete Hamlin F1. Steve Van Ootegham F2. Steve Van Ootegham F3. Mike Valde</p> <p>Rick Ney agreed to review and summarize the NSR Reform definitions as they apply to the BAE workgroup.</p> <p>When reviewing assigned items, each person should consider:</p> <ul style="list-style-type: none"> • Applicability to EPA Response to Comments as provided in Item H of the Preamble (67 FR 80199). • Applicability to BAE Workgroup Questions/Issues Identified (see handout). These are: <ul style="list-style-type: none"> ○ How do we handle debottlenecking? ○ How do we estimate and include start-up, shut-down, and/or malfunction emissions? ○ How do we handle fugitive emissions? ○ What is considered "demand growth" as there is no definition? ○ Under the netting recordkeeping, what is considered "reasonable possibility?" ○ What other netting recordkeeping and regulatory approval requirements may be necessary? ○ What is considered "accurate and defensible" data used for calculations? 	<p>Identified issues are to be sent to Wayne Jochmann by May 24th and Wayne will consolidate and distribute to workgroup.</p>

ITEM	SUBJECT	DISCUSSION	ACTION
5	Discussion of Issues	<p>It was identified that currently identified questions/issues before the BAE workgroup would have a presumptive priority over other issues subsequently identified.</p> <p>A discussion on debottlenecking occurred with some issues identified, although without apparent resolution. Some debottlenecking aspects discussed included:</p> <ul style="list-style-type: none"> • Is this within the scope of BAE? • The status of associated EPA rulemaking (perhaps only if it is necessary to increase an existing permit limit). • Increased plant utilization vs. debottlenecking (see Section H.8 of preamble regarding plant utilization). • Define “what is not” debottlenecking vs. “what is debottlenecking. <p>What existing applicable state regulations may be impacted or otherwise need to be considered by the NSR/BAE Reform Workgroup recommendations?</p>	None
6	Next Meeting Date	<p>It was agreed that the next meeting will be at June 7th at 10:00 am and held at the IDNR offices in Urbandale. Wayne Jochmann and Jim Hodina will prepare a draft agenda for the workgroup to review and approve prior to the meeting. Workgroup members agreed that the first meeting was successful, but that greater pre-meeting preparation will be beneficial.</p>	IDNR will reserve conference room. Lunch will not be brought in.

Distribution:

NSR Workgroup